

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-180-C**

IN RE:

Application of South Carolina Telecommunications Group)
Holdings, LLC d/b/a Spirit Communications To Amend)
its Certificate of Public Convenience and Necessity To)
Provide Facilities-Based and Resold Local Exchange, and)
for Flexible Regulation of its Local Exchange Services)
_____)

MOTION FOR EXPEDITED REVIEW

South Carolina Telecommunications Group Holdings, LLC d/b/a Spirit Communications (“Spirit”) hereby respectfully moves for expedited review of its Application to amend its Certificate of Public Convenience and Necessity (“CPCN”) to provide facilities-based and resold local exchange telecommunications services throughout the State of South Carolina. By its Application, Spirit proposes to expand its offering of local exchange services throughout the State of South Carolina. Spirit also requests flexible regulation for its expanded local exchange service offerings.

In Order No. 2014-806, the Commission granted Spirit authority to provide local exchange services in designated areas of South Carolina under flexible regulation, as well as authority to provide intrastate interexchange services under alternative regulation throughout the State of South Carolina.

Spirit requests that this matter be decided by the Commission at the Commission’s earliest opportunity, in a regularly-scheduled agenda session, and that the Commission cancel the formal hearing on this matter, which is currently scheduled for August 1, 2016. This motion is made on the following grounds:

1. Spirit published notice of the filing of the request in a newspaper of general circulation, as required by the Commission. The deadline to intervene in this matter was June 6, 2016.

2. The South Carolina Office of Regulatory Staff (“ORS”) is a statutory party to this action. *See* S.C. Code Ann. § 58-4-10(B). On June 24, 2016, the ORS filed a letter in this docket stating that it does not oppose the Commission granting Spirit’s Application. Spirit’s counsel has consulted with counsel for the ORS, and the ORS does not object to proceeding without a formal hearing in this matter.

3. The South Carolina Telephone Coalition (“SCTC”) intervened on the docket and is a party to this action. On June 7, 2016, the SCTC filed a Stipulation agreed to and signed by the SCTC and Spirit on June 6, 2016, in which the SCTC stated that as a consequence of the stipulations and conditions in the Stipulation that the SCTC does not oppose Spirit’s Application. Spirit’s counsel has consulted with counsel for the SCTC, and the SCTC does not object to proceeding without a formal hearing in this matter.

4. No other comments or petitions to intervene were received in response to the notice. Thus, all interested persons have been afforded an opportunity for a hearing, as required by S.C. Code Ann. § 58-9-280(B), Section 1-23-320(a) of the South Carolina Administrative Procedures Act, and constitutional due process. Proceeding without a formal hearing in this matter would serve the public interest in administrative efficiency.

5. Spirit is a private company that was organized in the State of South Carolina on December 29, 2000. Spirit is located at 1500 Hampton Street, Columbia, SC 29201. Spirit currently holds a CPCN from the State of South Carolina. *See* Order No. 2014-806 in Docket No. 2014-276-C (Oct. 1, 2014) (granting certificate to provide local

exchange service within the operating areas of BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina, Frontier Communications of the Carolinas, Inc., United Telephone Company of the Carolinas, Inc. d/b/a CenturyLink, and Windstream South Carolina, LLC, and for flexible regulation of these local exchange services; also granting certificate to provide intrastate interexchange services throughout the State of South Carolina, and for alternative regulation of these interexchange services). Spirit has been providing local exchange and long distance services in the State of South Carolina since 2014. The CPCN previously granted to Spirit was granted upon a finding by the Commission that Spirit has the technical, financial, and managerial resources sufficient to provide the requested services within the State of South Carolina, and that Spirit meets all other requirements of certification. Spirit continues to meet these requirements, and continues to have the technical, financial, and managerial resources sufficient to provide the requested services throughout the State of South Carolina, as demonstrated in Spirit's Application, specifically in Exhibits C (Spirit's Consolidated Financial Statements) and D (Spirit's Summary of Experience of Key Personnel) to the Application, as well as in the verified Testimony of Michael D. Baldwin, filed in above-captioned docket on June 17, 2016.


6. Spirit's wholly-owned subsidiary, South Carolina Net, Inc. ("SC Net") is also a South Carolina corporation, is also located at 1500 Hampton Street, Columbia, SC 29201, also currently holds a CPCN to provide intrastate interexchange services throughout the State of South Carolina (*see* Order No. 92-333 in Docket No. 92, 113-C, May 13, 1992), and also currently holds a CPCN to provide local exchange services in areas of the State served by BellSouth (now AT&T), GTE South (now Frontier), and

United Telephone (now CenturyLink) (*see* Order No. 2000-549 in Docket No. 2000-121-C, July 5, 2000, and *see also* Order No. 2003-346, amending certificates to add Spirit Telecom d/b/a). SC Net has provided long distance services in the State of South Carolina since 1992 and local exchange services in the State of South Carolina since 2000. In the certificates granting authority to SC Net, the Commission has also found that SC Net has the technical, financial, and managerial resources sufficient to provide the requested services within the State of South Carolina, and that SC Net meets all other requirements of certification.

7. The Commission is familiar with the operations and standing of Spirit and its affiliated companies.

8. Mr. Baldwin's verified Testimony in this docket, and the Exhibits filed with the Application, demonstrate that Spirit's request for expanded authority throughout the State of South Carolina and other relief, as requested in the Application, is warranted and that approval of the Application is in the public interest.

WHEREFORE, for the reasons stated above, South Carolina Telecommunications Group Holdings, LLC d/b/a Spirit Communications, respectfully requests that the Commission grant its request for expedited review of its Application to Amend its Certificate of Public Convenience and Necessity in this matter, and that the Application be approved at the Commission's earliest convenience.

By: 
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Columbia, South Carolina
June 27, 2016

STATE OF SOUTH CAROLINA)
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COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Carrie L. DeVier, hereby certifies that she is employed by the law firm of Herman & Whiteaker, LLC as attorneys for South Carolina Telecommunications Group Holdings, LLC d/b/a Spirit Communications and that she has caused the Motion for Expedited Review in Docket No. 2016-180-C to be served by United States Postal Service, first class postage prepaid and affixed thereto, and addressed to the following on June 27, 2016:

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